

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

MANDY GILBERT,	§	
	§	
Plaintiff,	§	CIVIL ACTION NO. 3:12-cv-00694-N
	§	
vs.	§	
	§	
NATIONWIDE DEBT	§	
MANAGEMENT SOLUTIONS, LLC,	§	
JOHN DOE CORP., TRACY WADE,	§	
ERIC MEDRANO, and STEVE	§	
CIPOLLA,	§	
	§	
Defendants.		

**REQUEST FOR CLERK’S ENTRY OF DEFAULT**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff hereby requests for entry of default judgment against Defendants Nationwide Debt Management Solutions, LLC (“Nationwide”) and Tracy Wade (“Wade”) (collectively “Defendants”).

Nationwide was served via personal service on April 16, 2012. *See* Exhibit “A.” Nationwide has offered no explanation for its failure to answer the instant Complaint. Wade was served via personal service on July 17, 2012. *See* Exhibit “B.” Wade has offered no explanation for her failure to answer the instant Complaint.

Accordingly, Plaintiff seeks default against Defendants in the amount of four thousand sixty dollars (\$4,060.00), representing statutory damages in the amount of one thousand dollars (\$1,000.00), 15 U.S.C. § 1692(k)(a)(2)(A), two thousand five hundred

dollars (\$2,500.00)<sup>1</sup> in attorney fees and five hundred sixty dollars (\$560.00) for court costs. This sum is supported by the Affidavit of undersigned, attached hereto as Exhibit “C.”

Respectfully submitted,

By: /s/Dennis R. Kurz

Dennis R. Kurz  
Texas State Bar # 24068183  
*Of Counsel*  
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(866) 842-3303 (fax)  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that on August 21, 2012, I electronically filed the foregoing document with the clerk of the U.S. District Court, Southern District of Texas, Houston Division, using the electronic case filing system of the court. Copy of the foregoing was sent to below via U.S. mail this 21st day of August, 2012.

Nationwide Debt Management Solutions, LLC  
c/o National Registered Agents, Inc.  
1780 Barnes Blvd SW  
Tumwater, WA 98512

Tracy Wade  
2440 Berrywood Drive  
Rancho Cordova, CA 95670

/s/ Dennis R. Kurz  
Dennis R. Kurz

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<sup>1</sup> Plaintiff has incurred in excess of \$4,500 in attorney fees but in the exercise of billing discretion seeks \$2,500.